

Pg. (D) of (5) Citations To Relevant Cases And  
Statutory Authorities

Here Within This Petitioner's, 28 U.S.C. 2254  
Habeas Corpus ; and the Grounds Therein ;  
And To Include, The Eleventh Appellate  
District Appeal Courts , Defendants ,  
Assignments Of Error's , To wit ;

(I.) The Trial Court Committed Plain Errors,  
To The Substantial prejudice Of The Defendant  
By Denying The Motion To Remove Juror  
Number (20) For Cause ; (Citing), Cotton V. United States,  
156 U.S 432, 15 S. Ct. 594, 37 L. Ed. 481 (1895)

(II.) Defendants Counsel Was Constitutionally  
Ineffective By Failing To Utilize A Peremptory  
Challenge To Remove Juror Number (20) ;  
(Citing), Berk V. Matthews, 53 Ohio St. 3d 161, 559,  
N.E. 2d 1301 (1990).

(III.) The Jury's Guilty Verdict's Are Against The  
Manifest Weight Of The Evidence; (Citing), Tibbs  
V. - Florida, 457 U.S. 31, 102 S. Ct. 2211, 22  
L. Ed. 2d 652 (1982) A Federal Case .

(IV.) The Trial Court Erred By Imposing Consecutive  
Sentences Because The Record Clearly And  
Convincingly Does Not Support It Finding That Multiple  
Offenses Were Committed, as a Course of Conduct .

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[State-Cases]

(Citing), Cross v Ledford, 161 Ohio St. 469,  
120 N.E. 2d 118 (1954). Also (Citing);

State v. Adams, 2d Dist Clark No. 2014-CH-13.

Herein And Through-out This Petitioner's  
Expansion Of His State Remedies; Appeals  
Motions, Petitions, are "Echo's" Thereof The  
Injustice Committed Within This Petitioner's  
Case; And More-over The States Ability To  
Avoid, Ignore And Dismiss These Opportunities  
Therefore "Corrective Justice" each time.

Later These Opposing Party Will (Say), This  
Petitioner Failed To Use All of His  
"State Remedies"; [But Wait A minute; I'm  
Sorry; they already did].

The Miscarriage Of Justice, Within This  
Petitioner, Keith L. Cooper Case; has been  
Reckless With Intent, By This Common Pleas  
Court Judge, for Prosecution; And Sadly, This  
Defendant's Criminal Defense Attorney.

\* Matter of Record - In - Matter of Law Was Disregarded,  
Pursuant to these Alleged Victims Criminal History.

Lg.(3) of (5)

This Petitioner, Moves This Honorable Court To View - If "quote" Made by a Juror;

The trial Court denied a challenge for cause to Juror Number (20), who answered that "he believed that there "Should be no presumption of innocence" and that prior to hearing any evidence, "the number of Victims" indicated to him that Defendant Cooper was "Probably - Guilty". [After that Point This Defendant, Keith P. Cooper, Was Still Presumed Innocent].

- Why Didn't This Common Pleas Court Judge, Move For A "Mis-Trial"?

Defendant Cooper made Motions for judgment of Acquittal after the State's Case and after the Close of evidence, both of which were denied.

- This Defendant Should Have Been Acquitted, had it not been for this Judge's Bias, against him.

- Plain Error Was Evident, but pursuant to the Standard's of The United States Supreme Court, "Plain Error They Are Not", but yet with intent. This Ground / Assignment of error should have been in favor of Cooper.

Pg. (4) of (5)

This Oppositionis, Respondent's Answer / Return  
Of Writ, appears to be Sololy based on  
"Abusing And Overbreadth," Of There Own  
Personal Opinions, Thus Mixed With,  
There "Hypotheses"; To Wit, They Claim To  
Be Factually Correct;

Concerning What This United States District  
Court, Northern District Court of Ohio;  
Can And/or Can Not Do, And/or Review,  
And/or Accept As A "Mitigating" Circumstance  
That May or May Not Be In Favor of This  
Petitioner's 28 - USC - 2254 Habeas Corpus.

(Citing) The Fourteenth Amendment, Section (1.)  
Section (2) Sections (3), Section (4.) And  
Sections (5); The Rights Thereof &  
Citizen or Citizens of the United States  
and of the State Wherein they reside.

No State Shall make or enforce any law which Shall  
abridge the privileges or immunitiess of Citizens  
of the United States; Nor Shall any person within  
its jurisdiction And/or State deprive any person of  
Life, Liberty, or property, without due process of  
Law; Nor deny equal protection of the laws.

By (5) of (5)

- This State Prosecution, Did Not Find, Nor, Demonstrate Rational Basis Of Facts To Find Each Element Of the Crime Beyond A Reasonable Doubt.
- The Alleged Victims Testimonies Where [Contrary] To All Of There Police Reports; And They Where Explicitly Conflicting. They Where "Not" Sufficient Weight Of Evidence To Thus, Support Any And All Convictions.

\* Please Note That The Common Pleas Court And Prosecutor, And There Assigned Counsel, Failed To Provide The Alleged Victims Individual Police Reports Within The "State Court Records," And Documents That Where So Ordered By This Honorable United States District Court. "Why Where Those Documents Excluded"?

- This Petitioner Respectfully Moves This Honorable Court, To Dismiss This Oppositions, "Respondent's Answer/Return Of Suit;" Of Which Was Two Days Late, And Past The Ordered And Required Dead-line." How Dare They Bogue Time Statute Of Limitation's, In Commit Time-Limitation Offense, Pursuant to there own Agreements.

Conclusion

The Petitioner Moves His Honorable Federal Habeas Corpus Court to "Dismiss" the Respondent's Answer / Return Of Writ, And If Request, For The Serious Reasons, Set Forth herein. Because The Case Can Be Decided From The Records And Police Reports Conflicting Statements And The Biased House Of Discretion, And Extended Leverage & Partiality Demonstrated By This Common Pleas Court, Judge. And If Evidentiary Hearing Shall Confirm And Affirm This Petitioners Facts, Findings And Conclusions Of Law.

This is a Request Therefore Evidentiary Hearings, To Proceed, And/or And Acquittal.

Respectfully Submitted, By,

Keith F. Cooper

Keith F. Cooper, Pro Se: A 774-191

Licking Correctional Institution

P.O. Box 8107

Mansfield, Ohio, 44905

Dated, April 25, 2024

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Traverse To Return Of Writ.  
was sent to: Dave Yost Attorney General at: 30 E. Broad Street  
23FL, Columbus, Ohio, 43215 by regular U.S. Mail, postage prepaid, on this 25 day  
of April, 2024.

Keill F. Cooper  
Keill F. Cooper, # 224-191  
(Name & Number)

Defendant, Pro Se